

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**THE OUTDOOR CHANNEL, INC.,**  
**a Nevada Corporation**

**Plaintiff,**

**v.**

**PERFORMANCE ONE MEDIA,**  
**L.L.C. d/b/a IN COUNTRY**  
**TELEVISION, INC., a New York**  
**Limited Liability Company; and**

**ROBERT J. SIGG, an individual**

**Defendants.**

**Case No. 10-CV-30-JHP-PJC**  
**JURY TRIAL DEMANDED**

**INJUNCTIVE RELIEF REQUESTED**

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**DEFENDANTS PERFORMANCE ONE MEDIA, LLC, PERFORMANCE ONE MEDIA,  
LLC D/B/A IN COUNTRY TELEVISION, AND ROBERT J SIGG’S UNOPPOSED  
MOTION TO STRIKE ORDER GRANTING PROTECTIVE ORDER AND MOTION  
FOR PROTECTION PURSUANT TO FRCP 26(C)**

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Defendants Performance One Media, L.L.C., Performance One Media, L.L.C. d/b/a In Country Television (“Performance One”), and Robert J. Sigg (“Sigg”) (collectively “Defendants”), by and through counsel, hereby submits this Motion to Strike Order Granting Protective Order and Motion for Protection Pursuant to FRCP 26(C) (Doc. No. 61) (“Motion to Strike”). In support of this Motion to Strike, the Defendants state the following:

1. On July 23, 2010, the Court issued its Minute Order staying its ruling on the pending Motion to Dismiss (Doc. No. 22). Subsequent to that Order, Defendants filed Motions to Stay Non-Jurisdictional Discovery and for Protection Pursuant to FRCP 26(C) (Doc. Nos. 55, and 56).

2. The Parties then negotiated a Protective Order, wholly unrelated to the pending Motions to Stay Non-Jurisdictional Discovery and for Protection Pursuant to FRCP 26(C).

3. This Protective Order was mistakenly submitted to the Court by the undersigned counsel in connection with Defendants' Motion for Protection Pursuant to FRCP 26(C) (Doc. No. 56) thereby causing the Court to grant not only the Protective Order but also Defendants' Motion for Protection Pursuant to FRCP 26(C).

4. The parties have not reached any agreement regarding Defendants' Motions to Stay Non-Jurisdictional Discovery and for Protection Pursuant to FRCP 26(C) and these motions should remain at issue.

5. The undersigned counsel should have filed a separate application for Protection and submitted its Proposed Protective Order in connection to said Motion.

6. Defendants' respectfully request the Court Strike its Order issued on September 27, 2010 Granting the Protective Order and Defendants' Motion for Protection Pursuant to FRCP 26 (C) (Doc. No. 61) and instead consider the Joint Application for Protective Order which will be correctly filed this afternoon.

7. Defendants' counsel has conferred with counsel for Plaintiff and advised them of this Motion which is being filed unopposed.

**RESPECTFULLY SUBMITTED** this 28th day of September, 2010.

/s/ Mary Elizabeth Nesser

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ATTORNEYS FOR DEFENDANTS  
PERFORMANCE ONE MEDIA, L.L.C.  
d/b/a IN COUNTRY TELEVISION, INC.,

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 28th day of September, 2010, I electronically transmitted the forgoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Richard P. Hix, Esq.  
Rachel Blue, Esq.  
Sharolyn C. Whiting-Ralston, Esq.

*Attorneys for Plaintiff*

s/ Mary Elizabeth Nesser